



1 49.1(d). This application contains information that is protected by the attorney-client privilege and  
2 the work product privilege, including defense trial strategy. Failure to seal the application would  
3 impinge upon Mr. Reger's constitutional rights because he would not be able to provide the same  
4 frank, detailed information in a public filing.

5 Specifically, through this application, Mr. Refer is seeking the appointment of an additional  
6 lawyer and investigator. If granted opposing counsel will certainly become aware a second lawyer  
7 was appointed. However, the declaration in support of the request contains significant work product  
8 and detailed information about defense strategy to which the government is not entitled.  
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10 There is good cause for this court to use its authority under Federal Rule of Criminal  
11 Procedure 49.1(d) to file the 17(c) application and accompanying documents under seal.  
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13 Dated: September 6, 2023

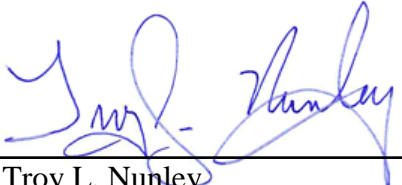
Respectfully submitted,

14  
15 By /s/ Kresta Nora Daly  
KRESTA NORA DALY  
16 Attorneys for Bradley Earl Reger  
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**ORDER**

Good cause appearing, the Court hereby orders the application for a second attorney and investigator and accompanying documents sealed.

Dated: September 7, 2023

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Troy L. Nunley  
United States District Judge